

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Docket Nos. 961, 974, 976, 977, 981-987

**CERTIFICATION OF COUNSEL WITH RESPECT TO SECOND OMNIBUS ORDER  
AWARDING INTERIM ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND FOR REIMBURSEMENT OF EXPENSES**

The undersigned hereby certifies the following:

1. On or about February 14, 2024, in accordance with *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members* [Docket No. 181], KPMG LLP, Silverman Consulting, Womble Bond Dickinson (US) LLP, Huron Consulting Group, Inc., Brown Rudnick LLP, Morris James LLP, Kurtzman Carson Consultants LLC, M3 Advisory Partners, L.P., Baker & Hostetler LLP, Jefferies LLC, and White & Case LLP (each a “**Professional**” and, collectively the “**Professionals**”) filed for the second interim period their interim applications (each an “**Interim Application**” and, collectively, the “**Interim Applications**”) [Docket Nos. 961, 974, 976, 977, 981-987] with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

2. Pursuant to the Interim Applications, objections to the Interim Applications, if any, were to be filed and served no later than March 5, 2024 and March 7, 2024 at 4:00 p.m. (ET),

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

respectively (the “**Objection Deadline**”). The Professionals received no other responses to the Interim Applications and no objections or responses have been filed on the docket. The hearing to consider the approval of the Interim Applications is currently scheduled for **March 14, 2024 at 3:00 p.m. (ET)**.

3. The debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases prepared a proposed form of omnibus order (the “**Proposed Order**”) approving the Interim Applications, attached hereto as **Exhibit A**. The schedule of professional compensation attached as **Exhibit 1** to the Proposed Order, accurately represents the fees and expenses (including the reflection of any reductions) of the Professionals with respect to the Interim Applications.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order attached hereto as **Exhibit A** without further notice or hearing at the Court’s earliest convenience.

Dated: March 11, 2024

Respectfully submitted,

/s/ Morgan L. Patterson

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